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October 28, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, D.C. 20554

RE: Notice of Oral Ex Parte
Second Application of BellSouth Corporation, BellSouth
Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision
of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121

Dear Ms. Roman Salas:

On October 27, 1999, Jay Bradbury, David Eppsteiner, Sharon Norris, Rhonda Merritt, Marsha Rule and the undersigned, representing AT&T, had a telephone conference with Bill Agee, Jake Jennings and Andrea Kearney of the Commission's Common Carrier Bureau. At the request of FCC Staff, AT&T provided comment on the most recent version of the BellSouth Georgia Third Party Test Plan. The input AT&T provided at the meeting was consistent with the presentation attached to this ex parte submission, as well as the more detailed analyses that AT&T is submitting with this letter.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to be "JM" with a flourish, written over a horizontal line.

Joan Marsh

cc: B. Agee
J. Jennings
A. Kearney

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AT&T Comments on Georgia Revised Master Test Plan (Version 3.0)
Filed October 18, 1999

Improvements to the Georgia MTP
(Included in Versions 2 and 3)

- **Places HP and KPMG in appropriate roles to conduct the test, similar to those in New York.**
- **In some cases, the additional information provided by KPMG to existing tests is clarifies test**
- **Severity or software-related exceptions were eliminated as the sole means to report exceptions in the test. Added that KPMG will identify exceptions for defects in software, documentation, or process.**
- **Changed language to be more neutral or objective throughout the test, e.g. changed "verify that" to "evaluate whether" on Page II-11. *(Also made numerous cosmetic changes)***
- **Added more evaluation information (Appendix D-1).**
- **Added some opportunities for CLEC input.**
- **Added integration of pre-order and order transactions.**
- **Changed scalability to capacity management.**
- **Added that documentation issues encountered during the creation of transactions will be analyzed and reported in documentation review tests.**
- **Added a new ordering test called production volume test.**
- **Added process review activities to the functional activities for invoicing and usage. Added test calls to the review of billing.**
- **Added a new objective in Maintenance and Repair Section, in part to conduct some comparison between retail and wholesale processes, and to evaluate BST performance in making wholesale repairs.**
- **Added an evaluation of three months of flow through data reported to the PSC.**

AT&T Comments on Georgia Revised Master Test Plan (Version 3.0)
Filed October 18, 1999

New Deficiencies in the Georgia MTP
(Included in Versions 2 and 3)

- **In many cases the changes made by KPMG restrict information rather provide more detail.**
- **The exception process is not defined, and CLECs will only receive “summary” information on an unspecified schedule.**
- **The volume testing does not take place in the production environment (except for CRIS).**
- **Added references to usage of LCSC, Account Team, and Training, but no new tests or evaluation criteria were added to support an evaluation.**
- **The one reference to statistical analysis was deleted. Statistical analysis is included in other test plans.**
- **Scenarios for UNEs have been reduced by more than 25%.**
- **Added “establishment of business with CLECs” to pre-order, order and provisioning sections of the test, but appeared to add no test activities to support.**
- **Deleted a critical pre-order scenario, the validation of CLEC CSRs.**
- **Eliminated the testing of canceling an order.**
- **Several test processes were eliminated from ECTA tests.**
- **Changed audit of flow through to evaluation of flow through.**
- **All complex resale scenarios were deleted.**
- **Eliminated the testing of billing usage returns.**

AT&T Comments on Georgia Revised Master Test Plan (Version 3.0)
Filed October 18, 1999

Continuing Deficiencies in the Georgia MTP

- **The revised plan does not constitute a change in direction (per KPMG cover letter).**
- **Plan is an (only) slightly modified version of BellSouth's test plan.**
- **The roles of the testers are more limited than in other states due to the limits of the Georgia Order and BellSouth's plan.**
- ****Unlike tests in other states, test tools will be used instead of building interfaces.**
- ****CLECs remain virtually uninvolved and uninformed about the test. No "blind" testing through use of CLECs.**
- ****Tests only 5 UNEs.**
- ****Plan provides no way to test for parity.**
- **Change control test is inadequate.**
- ****No functional testing of resale. Volume testing of complex resale questionable.**
- ****No testing of manual ordering.**
- ****OSS99 upgrade not tested.**
- ****No testing of interconnection, collocation, or network planning.**
- ****No testing of LENSs.**
- ****No testing of process to establish CLEC account and business relationship.**
- ****No testing of account team.**
- ****No testing of help desks, such as LCSC.**
- ****No testing/review of BellSouth's retail performance (includes one process review of repair).**
- ****No testing of parity of provisioning.**

AT&T Comments on Georgia Revised Master Test Plan (Version 3.0)
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- ****No testing of coordination of provisioning and repair.**
- ****No volume testing of TAFI.**
- ****No analysis of the processes and systems used to capture performance data and calculate metrics.**
- ****No statistical methodology**
- ****No specifics on normal and peak volumes test amounts.**
- ****No testing of training**
- ****No testing of billing claims and evaluation of daily usage feeds processes.**
- ****No testing of invoicing or usage for resale.**

****These tests are present in the Florida draft MTP.**

Overview of Georgia Third Party Test (TPT) Plan

Essential Elements of a Third Party Test Plan	Concerns with Initial Plan Version 1.0	Concerns with Revised Master Test Plan (RMTP) Version 3.0
<p>There should be a neutral, independent tester. The value of third party testing can only be achieved if that party is seen as credible and its evaluation will be seen as objective and unbiased.</p>	<p>The roles of the testers are limited and lack independence.</p> <ol style="list-style-type: none"> 1. BellSouth engaged the third party testers (TPTs) and prepared the test plan, eliminating independence. The TPTs merely follow BellSouth's plan. 	<ol style="list-style-type: none"> 1. KPMG provided revisions to the plan in Version 3.0, in some cases incorporating HP's revisions of Version 2.0, in other cases eliminating HP's revisions, as well as making additions. KPMG's cover letter to the Georgia PSC states the plan provides "additional <i>detail</i> about various aspects of the evaluations, and <i>reflects the changes in the respective roles and responsibilities</i> of KPMG and Hewlett Packard." It also states that the "<i>updated material does not constitute a change in direction</i> with respect to the testing <i>nor is it in conflict with the Commission's July 2, order approving BellSouth's Third Party Test Plan.</i>" In sum, the plan, while modified, remains BellSouth's plan, and while the roles of KPMG and HP have changed, their relationship to BellSouth has not. It also remains compliant with the Georgia

	<p>2. The roles of the TPTs are different – and more limited – than in the NY test.</p> <p>3. In NY, for example, KPMG prepared and managed the test, and also fulfilled the functions of the pseudo-CLEC’s marketing, sales and customer service organizations, preparing and making all test case inputs for the interface systems. In contrast, the GA plan does not provide for a Test Manager other than BellSouth, and KPMG functions as an auditor.</p> <p>4. In NY, HP’s role was that of the pseudo-CLEC’s Information Technology group, building and maintaining the interfaces and inputting the KPMG-prepared test cases when required. The GA plan calls for HP to conduct the test using BellSouth’s interfaces, rather than building its own, and to fulfill roles outside its area of expertise and beyond those played in NY, including acting as a surrogate marketing, sale and customer service organization by preparing and constructing test case inputs.</p>	<p>PSC, which stated in its Order that “the Commission does not believe that a full third party audit of all interfaces and services is necessary at this time.”</p> <p>2. The roles of the TPT’s are now similar to their roles in New York, but continue to be more limited than the New York test due to limits of the Georgia Order and BellSouth’s plan.</p> <p>4. The plan still appears to call for the utilization of BellSouth’s test tools “due to operational and time constraints of the procedural Order.” (page II-2). AT&T is unaware of any constraints in the Order that would prohibit building interfaces.. Additionally, unlike the New York test, there is no stated requirement that for the Test Transaction Generator (TTG) to document its ability to build, test, and place in operation the functionality to process transactions using the RBOC’s documentation, account management, help desk, and training support.</p>
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<p>The neutral, independent third party should develop the test plan. The third party responsible for monitoring and evaluating BellSouth's performance should be the party responsible for developing the test plan, after taking input from all parties, including BellSouth.</p>	<p>1. E&Y appears to have developed the test plan on BellSouth's behalf. There was no input to the plan development from the named testers, or the CLEC community. Therefore, the parties responsible for implementing the plan or who would benefit from a comprehensive plan has not been involved in its design.</p>	<p>1. KPMG provided revisions to the plan in Version 3.0, in some cases incorporating HP's revisions of Version 2.0, in other cases eliminating HP's revisions, as well as making additions. KPMG's cover letter to the Georgia PSC states the plan provides "<i>additional detail</i> about various aspects of the evaluations, and <i>reflects the changes in the respective roles and responsibilities</i> of KPMG and Hewlett Packard." It also states that the "<i>updated material does not constitute a change in direction</i> with respect to the testing <i>nor is it in conflict with the Commission's July 2, order</i> approving <i>BellSouth's</i> Third Party Test Plan." (emphasis added) In sum, the plan, while modified, remains BellSouth's plan, and all changes must be approved by BellSouth. It also remains compliant with the Georgia PSC, which stated in its Order that "the Commission does not believe that a full third party audit of all interfaces and services is necessary at this time." Moreover, the CLECs remain virtually uninvolved in any aspect of this test. While the revised test mentions has occasional references to CLEC input and use of CLEC switches for LNP testing, the plan falls woefully short in comparison to the CLEC input and involvement in the New York and Pennsylvania plans, and the Florida draft plan. CLECs have not been</p>
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		involved at all in the development of the Georgia test plan.
<p>The test must be conducted by the third party, not just monitored by it.</p> <p>Using existing new entrants to conduct the test, with their specific market plans and interfaces, will not test the broad range of functionality and support required of an RBOC, nor will it test the RBOC's current state of readiness.</p>	<p>The roles of the TPTs are circumscribed by the plan, limiting the test to those circumstances and scenarios prescribed by BellSouth. Additionally, the plan includes conflicting information regarding whether HP will build an interface or use BellSouth test facilities.</p> <ol style="list-style-type: none"> 1. KPMG's assigned roles are to approve the test plan and to audit, monitor, evaluate and report, while HP is to conduct feature, function and volume testing using BellSouth's interfaces. These are not the roles performed by these parties in the NY test, and the assigned roles fail to utilize their expertise. 2. The test plan does not address the test manager role. 	<ol style="list-style-type: none"> 1. The roles of the TPT's are now similar to their roles in New York, but continue to be more limited than the New York test due to limits of the Georgia Order, their business relationship, and with the contents of BellSouth's plan. 2. The plan now indicates that KPMG was designated as the test manager on September 2, 1999.
<p>The test should cover all OSS and support processes needed by the new entrant to enter the market. Operations support systems include systems, information and personnel that support network elements or services. They are the automated and manual processes required to make resale services and unbundled network elements, among other items, meaningfully available to competitors.</p>	<p>The test plan is severely limited in scope and scale, and will only test a few of the UNEs and interfaces used by competitors, drastically limiting the test's usefulness to regulators and competitors.</p>	<p>The revised test plan includes enhancements in some areas and further limitations in others.</p> <ul style="list-style-type: none"> --net reduction in the number of test scenarios for UNEs by 25% (See Appendix B-3 of RMTP) --reduced the number of billing activities to be reviewed, e.g. eliminated Billing Usage Returns Evaluation (Eliminated in Version 2.0) --further limited repair testing to include only test cases (Eliminated in Version 2.0)

		<p>--eliminated billing from the change management review (Eliminated in version 2.0)</p> <p>--reduced the types of pre-order transactions to be tested, e.g. eliminated scenarios calling for the retrieval of CSRs for CLEC's existing customers. (Eliminated in Version 2.0)</p>
	<ol style="list-style-type: none"> 1. Only five UNE products will be tested, although the test plan states that BellSouth offers 80 UNEs. 2. Functionality testing will occur only within the 2-wire analog world, which represents only 5-7% of the products CLECs currently order. 3. There is no testing of resale functions, despite the fact that most CLECs currently compete via resale. 4. There is no testing of manual ordering despite the fact that BellSouth requires that the majority of the products and services it offers CLECs be ordered manually and receives 50% of its overall orders and over 90% of its UNE orders manually. 5. The plan does not call for testing interconnection OSS, or the majority of BellSouth information and services that CLECs rely upon to enter the market. 6. LENS will not be tested, despite the fact that the majority of competitors use it to order service today. 	<ol style="list-style-type: none"> 1. Concerns not remedied. 2. Concerns not remedied. 3. Concerns not remedied. 4. Concerns not remedied. 5. Concerns not remedied. 6. Concerns not remedied.

	<p>7. It appears that the 3PT tester will not build an interface to test BellSouth's OSS, but will instead will use BellSouth provided test tools.</p> <p>8. It appears that EDI-mainframe will not be tested.</p>	<p>7. Concerns not remedied.</p> <p>8. Concerns not remedied. Although the test now contains language about a LAN to LAN EDI, there is no test objective that evaluates BellSouth methods and procedures for developing, providing and maintaining OSS interfaces.</p>
<p>The test plan should allow the TPT to 'stand in the shoes' of a CLEC entering BellSouth's market, so it will be able fairly to evaluate BellSouth's performance with regard to all tasks normally performed in conjunction with a CLEC's market entry, including such areas as:</p> <ul style="list-style-type: none"> • Interconnection, and network planning • Account management process • Training • Interface development, including BellSouth's documentation, with review of such items as technical specifications, business rules, CLEC handbooks, etc. • Change Control Processes – all changes to systems, processes and documentation during the test must be made through the established Change Control or Account Management Process, whether initiated by BellSouth or requested by the TPT or a CLEC • Test plan should include an evaluation of 	<p>The test plan will not allow the TPT to assess BellSouth's performance on most areas critical to CLECs' ability to enter the local market, which have been the subject of much dispute at state commissions.</p> <p>Unlike the NY plan,</p> <ol style="list-style-type: none"> 1. The business needs of CLECs are not represented in the GA test, since CLECs were not polled during plan development, nor do they have a defined and meaningful role in the implementation of the test. 2. There is no evaluation (not even a document review) of the processes necessary to establish a CLEC account and business relationship with BellSouth; instead, the testers will be provided with a pre-existing set of identifiers, authorizations and passwords. 3. There is no evaluation of processes necessary to conduct business with 	<p>1. Concerns not remedied.</p> <p>2. Although the RMTP makes a reference in Section II, page 4 to utilization of the account team, it will not evaluate this function. There are no test processes described elsewhere in the document that address evaluation of those functions, as are included in KPMG test plans in other states.</p> <p>3. Although the RMTP makes a reference in Section II, page 4 to utilization of the account</p>

<p>BellSouth's compliance with its established procedures.</p>	<p>BellSouth on an on-going basis through an assigned account team.</p> <ol style="list-style-type: none"> 4. No test activities address network design, collocation, or interconnection planning, which are areas of great concern to CLECs. 5. The test will use BellSouth's internal systems testing tools, including BellSouth's internal sending and receiving simulators, but the functionality of BellSouth's internal simulators (unlike its interfaces) is not at issue. 6. BellSouth's plan to review change control is inadequate. Not only is BellSouth's decision to "maintain a stable OSS environment for the duration of the test" inconsistent with CLEC's experience of constant change, its change control proposal is designed to ignore the way changes are made. By focusing only on the Electronic Interface Change Control process, the review will not address the manner in which most changes are made to 	<p>team, it will not evaluate this function. There are no test processes described elsewhere in the document that address evaluation of those functions, as are included in KPMG test plans in other states.</p> <ol style="list-style-type: none"> 4. Concerns not remedied. 5. Concerns not remedied. The test attributes the use of internal testing tools to "operational and time constraints of the procedural Order" in Section II, page 2 of the RMTP. However, a review of the PSC Orders in this matter reveals no operational or time constraints that would dictate the use of test tools. 6. Concerns not remedied. Although carrier notifications were added, the test was further limited through the elimination of billing from the review.. Review should not be limited to use of EICCP and Carrier Notification, but should also include items such as day to day changes that impact CLECs. <p>Additionally, it is not clear that this objective will meet the change management test requirements of the FCC letter to US West</p>
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	<p>interfaces and related documentation needed by CLECs. Further, the review of the change management process involves only document review and interviews, with no observation or usage of the process.</p>	<p>regarding CLEC involvement in change management, release implementation (such as OSS), and dispute resolution.</p>
<p>The test must be designed to determine parity. The test must not only be designed to objectively and accurately capture and analyze performance data that reveals how BellSouth is providing service to new entrants, but also how those results compare to the service BellSouth provides itself and its affiliates.</p>	<p>The test plan provides no way to assess parity.</p> <ol style="list-style-type: none"> 1. The plan will not allow an independent assessment of BellSouth's internal performance and does not provide for validation of BellSouth's existing performance measures and results for either retail or wholesale performance. No performance standards are established for the test. 2. There is no review of or comparison to any aspect of BellSouth's retail operations. 3. Thus, the test will not allow CLECs or regulators to determine the relative level of BellSouth's performance. 4. The flow-through audit does not comply with the GA PSC's order in that it provides only for a self-contained audit of the transactions generated by the test, rather than an audit of the last three months of the operational flow through data currently reported monthly by BellSouth to the GA PSC. 	<ol style="list-style-type: none"> 1. Concerns not remedied. Despite the revisions to Appendix D of the RMTP to include a copy of an unapproved version of BellSouth's SQM, the RMTP does not establish any objective performance standard or benchmark for any test activity. 2. Concerns not remedied. (A wholesale/retail process review was added to M&R) 3. Concerns not remedied. 4. Concerns not remedied. Although a flow-through analysis of July-September flow through reports was added to the test, concerns remain. The test was changed from Audit to Evaluation. While the implication of this change is unclear, the section no longer complies with the language in the Commission's Order which requires a "full audit". Minimally, a full audit of the reports filed monthly would include an audit of

		<p>BellSouth's retail flow-through as well as that of the CLEC, but the evaluation does not appear to cover retail orders. Therefore the accuracy of BellSouth's retail reporting or parity cannot be evaluated. An audit or evaluation of any performance measure should also evaluate whether this measure is being implemented in compliance with the Commission's Order in Docket 7892-U, but that also does not appear to be covered.</p> <p>The test plan procedures for the evaluation are extremely brief and vague, more general descriptions than procedures, and are impossible to specifically comment on (They are the same as in the operational analysis test framework description on page III -2 of RMTP). It does not appear that this evaluation will comply performance measures evaluation criteria outlined in the 9/27/99 FCC letter to US West.</p> <p>The test addresses how the <u>accuracy</u> of this performance measure will be assessed. It is also unclear. However, if the plan intends that only to replicate the calculations using BellSouth data, that is insufficient to determine the accuracy of BellSouth's flow-through as reported monthly to the Commission. Such a process would not appear to include a review of BellSouth's error analysis, as is required by the Commission's</p>
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	<p>5. BellSouth ensures its success by structuring the test so that if it cannot perform the function or perform it effectively, it declares that the outcome to be the expected result, or declares the function outside the scope of the test. For example, billing ; usage accuracy is tested not by whether the data is accurate, but how fast it is sent, the evaluation of the Maintenance and Repair processes does not test the actual maintenance and repair of service, etc..</p>	<p>Order, and does not constitute a "full audit." (Also see comments on page 9 of Attachment A).</p> <p>5. Concerns not remedied.</p>
<p>All Operations Support Systems and OSS versions that actually will be used should be tested. All OSS functions, (i.e., pre-order, ordering, provisioning, billing and repair) must be tested. Omission of any of these items leaves critical gaps in the processes necessary to provide service to the customer. For example, if a service can be provisioned but billing information is inaccurate or untimely, the CLEC receives discriminatory treatment. This comprehensive testing necessarily includes all operational support systems, including all procedures, processes and systems offered by BellSouth for use by new entrants.</p>	<p>The limited interfaces, processes and product types being tested, discussed above, severely limit the usefulness and effectiveness of the test.</p> <ol style="list-style-type: none"> 1. Additionally, the test does not cover critical improvements needed by CLECs in the OSS 99 upgrade. 2. LENS is not tested, although it is the sole interface used by the majority of CLECs. 3. The test covers only a small subset of BellSouth's OSS. 	<ol style="list-style-type: none"> 1. Concerns not remedied. 2. Concerns not remedied. 3. Concerns not remedied.
The test must cover the full range of	Functionality testing is limited to 2-wire	Concerns not remedied.

<p>products, including services BellSouth offers or is required to offer, but is not providing today. Any limitation on testing runs the risk of favoring one market entry mode over another. As BellSouth is required to support all forms of market entry, all forms should be tested. And because these processes constantly being modified, BellSouth's change control processes must also be subject to review.</p>	<p>analog loops and ports, separately and in combination with number portability.</p> <ol style="list-style-type: none"> 1. Testing of these limited numbers of UNEs is further limited in that they will not be tested over the full range of pre-ordering, ordering, provisioning, billing, maintenance and repair processes. 2. Since BellSouth will "maintain a stable OSS environment" during the test, the test results cannot be extrapolated to predict BellSouth's continued ability to process even these limited types of orders unless its change control process is reviewed. 	<ol style="list-style-type: none"> 1. Integration has been added to the test. It is not clear how robust the integration is. 2. Concerns not remedied.
<p>Test the ability of BellSouth to provide non-discriminatory support at commercial volumes. The goal of testing is not simply to confirm that a particular functionality or new methodology exists, but to determine if new entrants can use these items to create meaningful competition. Therefore no test is complete without simulating the demands of a robust marketplace on BellSouth's operations support systems, including its procedures and its people who perform the work.</p>	<p>The test plan allows BellSouth to determine what constitutes normal and peak transactions of volumes and numbers of users.</p> <ol style="list-style-type: none"> 1. The plan is extremely vague on this subject. 2. Additionally, the test clearly is not "blind", so BellSouth would be well able to prepare for test dates and volumes/types of orders that will arrive on any given date. Thus, it cannot neither simulate nor test BellSouth's performance in a production environment. 	<ol style="list-style-type: none"> 1. Concerns not remedied. 2. Concerns not remedied. KPMG removed HP's claims in Section II, page 3 of the RMTP that testing will be "blind". Test orders will be uniquely identified, and the plan states that the "Test Cycle Manager will coordinate with BellSouth to ensure that BellSouth's and KPMG's performance measurements system are prepared to track test transaction performance prior to beginning the Test." This phrase or something similar appears in the description of every transaction oriented

		test cycle. (For example, see RMTP, Section V, page 3, last paragraph) Additionally, provisioning is very orchestrated, with KPMG to “verify the provisioning appointment date and time” and “meet BellSouth provisioners for appointment.” (See RMTP, Section V, page 25) No CLEC live orders, the only actual blind orders, will be used in the test.
Don’t just test it, fix it. The purpose of the test is to facilitate market entry. BellSouth therefore should be required to promptly correct all deficiencies uncovered by the test.	<p>The plan only requires re-testing of failures or defects related to program errors. Thus, if the program works as designed, but the design is flawed, no re-testing is required. Similarly, if the program works as designed but BellSouth’s documentation is incorrect, no re-testing is required.</p> <ol style="list-style-type: none"> 1. The test plan is designed to “prove the existence” of specified functionalities, with no provision for correction of deficiencies unrelated to program or system errors. Basic design or execution flaws would be neither detected nor corrected. 	<ol style="list-style-type: none"> 1. Concerns not remedied. The exception process was revised to delete the severity levels, and to state the interim status reports would “include a summary of exceptions.” It is unclear how frequently the summaries will be made available. Additionally, a summary of exceptions may well provide CLECs with insufficient information to make a meaningful response. The exception process remains largely undefined.

Additional comments on Georgia Third Party Test Plan Revisions Version 3.0

I. Document Control

The revised test plan does not appear to be approved by the PSC. However, the status reports indicate that work is underway.

II. Introduction

Test Manager's Interfaces (Page II-2)

It appears that the test still calls for the utilization of BellSouth's test tools as opposed to building of interfaces "due to operational and time constraints of the procedural Order." AT&T is unaware of any constraints in the Order that would prohibit building interfaces. While the plan indicates that the "test client is made available to all CLECs", it was developed by BellSouth and is made available for testing, not for production. The plan states the "testing will evaluate the accuracy of the technical and business rule documentation provided by BellSouth to support the interfaces specified in the Georgia Order," however, unlike the New York test there is no stated requirement that for the Test Transaction Generator (TTG) to document its ability to build, test, and place in operation the functionality to process transactions using the RBOC's documentation, account management, help desk, and training support.

Volume Testing Environment (Page II-3)

The volume testing takes place outside the production environment (except for CRIS)

Other Support Functions (Page II-3)

While this section references that it will be utilizing the LCSC, the Account Team, and CLEC training, it does not state that it will be evaluating those functions. Additionally, there are no test processes described elsewhere in the document that address evaluation of those functions.

Scope (Page II-3)

Appropriately, the word "scope" was deleted and replaced with "design" inserted to describe the relationship of the Georgia Master Test Plan (MTP) to the New York test.

Test Objectives (Pages II 9 and 10)

Interestingly, the word "non-discriminatory" was deleted from the test objective for interface test, but the words "meaningful opportunity to compete" were left in the functionality test objective.

Deliverable Scope (Page II-10)

The exception process was revised to delete the severity levels, and to state the interim status reports would “include a summary of exceptions.” While the Commission’s Order provides for CLECs to respond to interim reports¹, the process is deficient in at least two major aspects; 1) there is no schedule for interim reports², leaving CLECs in the dark as to how timely or meaningful their responses can be in terms of input to the Commission, and 2) a “summary” of exceptions may well provide CLECs with insufficient information to make a meaningful response.

This section confirms that Version 3.0 of the MTP is consistent with the Commission’s May 20 Order.

Test Scope (Page II-14)

The military style testing was revised to eliminate the severity level testing, and added “or until a determination is made to halt testing of a target” to its conditions for regression testing.

III. Test Plan FrameworkTest Tools (Page III-4)

The issue that test tools to be used are provided to CLECs is indicated again in this section. However, these tools are developed by BellSouth, not CLECs based on BellSouth-provided documentation, and are not provided for use in a production environment. Therefore, they are not dispositive of CLEC experience in the marketplace.

This section indicates that volume testing will be done via TTGs. It is unclear who built these TTGs and why they are not used for functional testing.

Results Assessment (Page III-5)

The exception process has been modified. It now indicates that software, documentation, and processes will be subject to the exception process. However, the process itself remains undefined, stating that “KPMG, the Commission, and BellSouth will address

¹ There have been three interim reports since the Commission’s Order of June 28 approving BellSouth’s June 9 revised test. The first was filed on July 22, 1999, the second on September 10, 1999 (A revision was filed to the September 10 report on September 21, but it only contained one minor change.), and the third on October 25, 1999. This is in stark contrast to the weekly or more frequent communication occurring in Florida and Pennsylvania.

² The September 27 letter from the FCC Staff to US West calls for formal, **predictable**, and public mechanisms for the third party tester to communicate to both the BOC and the CLEC community issues identified by the third party tester that arise during the course of testing.

exceptions through a process defined by the three parties.” It is unclear whether this process definition has taken place. However, the establishment of an exception process is a global entrance criterion, and therefore should have occurred before any testing takes place. An appropriate exception process should be detailed, real-time, and have a realistic opportunity for meaningful CLEC involvement.

Evaluation Criteria (Page III-6)

The following reference to statistical analysis was deleted, “In those cases where results deviate, statistical analysis will be undertaken to determine the significance of the deviation.” There appears to be no statistical analysis as is contained in the New York test and the Florida draft test plan.

Entrance Criteria (Page III-7)

An entrance criteria present in the New York and Florida plans, but not included in the Georgia MTP, was that the TTG (or CSI³ in Florida) must be operationally ready.

The service quality measurements entrance criteria states, “Before many portions of the test can begin, these metrics must be agreed to and fully defined.” It is not clear who must agree to the metrics, however, it is clear that they are not fully defined, as no analogs or benchmarks exist in BellSouth’s SQM for many measures such as FOCs, rejections, and UNEs.

IV. Pre-Ordering Test Section

Overview (Page IV-1)

The wording was changed to add that the tests would be undertaken to evaluate the systems and operational elements associated with BellSouth’s *establishment* and maintenance of business with CLECs. However, there is no objective to evaluate the methods and procedures for the development and provision of OSS interfaces (Test PPR5 in the Florida draft test plan). Additionally, there is no account establishment and management objective as is included in the New York and Florida tests.

TAG Pre-Order Documentation Documentation Criteria (Page IV-14)

The TAG test agreement should also be reviewed. If KPMG used such an agreement, it should be compared to the one used by CLECs such as AT&T.

³ The entrance criteria description for the Certified Software Interface or CSI in Florida states, “The CSI is to be developed by the Phase II test manager based on the specifications and documentation provided by BST. The successful operation of the CSI will demonstrate the feasibility of developing, testing, and operating the CLEC side of the OSS interface based on documentation supplied by BST.”

V. Ordering and Provisioning Test Section

Overview (Page V-1)

The wording was changed to add that the tests would be undertaken to evaluate the systems and operational elements associated with BellSouth's **establishment** and maintenance of business with CLECs. However, there is no objective to evaluate the methods and procedures for the development and provision of OSS interfaces (Test PPR5 in the Florida draft test plan). Additionally, there is no account establishment and management objective as is included in the New York and Florida tests.

EDI-Functional Test Description (Page V-3)

Although the description states that a "limited number of resale scenarios will be tested to evaluate the functional elements of the ordering and provisioning process for resale orders, this same section later states that "the test scenarios to be used in the EDI functional test are described in Appendix B-3: UNE Ordering Scenarios."⁴

Scenarios for LNP and CLEC-to-CLEC migrations will use company data and central office data from CLECs operating in Georgia. It is unclear that CLECs will have any involvement other than the provision of this information for future use by KPMG.

Entrance Criteria (Pages V-4 and 5)

The following sentence was deleted, "PC EDI and or EDI LAN to LAN must be configured and installed" and replaced with, "Transaction submission tools installed and confirmed."

The following entrance criterion was deleted, "Account and security access to EDI must be established" and EDI connectivity must be established."⁵

Test Scope (Page V-6)

Eliminated the portion of the evaluation which tests cancelling an order. (also eliminated in the TAG test)

O&P -5 - Provisioning Verification Test (Page V-23)

⁴ Appendix A - Product Descriptions also indicates that resale orders will only be used for volume testing. (See page A-2)

⁵ These entries were not deleted from the EDI/TAG Normal and peak volume testing.

While the following sentence was added to the description, “Real CLEC provisioning activities will be observed to test end-to-end provisioning process on UNE-Loop orders”, there is no mention in test activities of CLEC involvement.⁶

VI. Billing Test Section

The revised test plan appears to have added process activities to the functional activities for invoicing and usage, but the detail that appears in other test plans such as New York and Florida draft plan are missing. It also appear to have added test calls to the review of billing.

The plan still does not address the billing work center evaluation, including the vital and troublesome area of claims handling for invoices, nor does it address the evaluation of daily usage feeds return or the bill certification process. It does not compare performance to retail, or validate the metrics.

The plan still does not address invoicing or usage for resale.

It is unclear how the performance results comparison can be administered using BellSouth generated metrics. For example, BellSouth measures invoice accuracy by determining what % of total billed revenues were subject to billing adjustments, while the test plan asserts that the results of “service orders and usage will result in invoice detail subject to evaluation by the Test Manager.” Similarly, the plan states that port usage will be used to determine Usage Delivery Timeliness, but BellSouth’s metric only measures the % of the data packs sent that had to be re-transmitted, not whether the contents were timely received based on when the usage was initiated.

The test has made numerous revisions to this objective and has added process review to the transaction activities. However, the detail that exists, for example, in the Florida draft test plan for billing process review, is not present in this document for the functional test, and hinders the process of analysis of this section.

VII. Maintenance and Repair Test Section

TAFI Functional Test (Page VII-3)

The objective of the Georgia test is to validate the *existence* of TAFI trouble *reporting and screening*... while the objective of the New York and Florida draft tests is to validate the *existence and behavior* of (TAFI) functional elements and evaluate the equivalent of CLEC (TAFI) functionality to RBOC residence and business equivalent retail systems.

⁶ Unlike the Georgia test, the draft test plan in Florida for this test target also calls for CLECs to be asked to provide data on their experiences with provisioning, includes the identification of CLEC volunteers in the entrance criteria, and states in the test activities that the test data be compared to BST retail and other CLECs.

ECTA Functional Test (Page VIII-10)

The objective of the Georgia test is to validate the *existence* of ECTAI trouble *reporting and screening*... while the objective of the New York and Florida draft tests is to validate the *existence and behavior* of (ECTA) functional elements and evaluate the equivalent of (ECTA) functionality to RBOC trouble entry systems.

Several test processes, e.g. access to test capability, access error reports, and some trouble report capability, were eliminated from the ECTA test.

There is no volume test for TAFI.

ECTA Normal Volume Test (Page VIII-14) and ECTA Peak Volume Test (Page VIII-19)

Several processes were eliminated from the test.

M&R Performance Results Comparison (Page VII-27)

It is unclear how the results of the TAFI and ECTA functional and volume tests can be used to compare to the provisioning M&R measures such as on page VII-28 when no provisioning activities are listed in the test activities. Additionally, there do not appear to be test activities to generate results for the average answer time listed on page 28.

The Georgia MTP does not include the evaluations of the M&R work centers and network surveillance and support as do the New York and Florida plans.

M&R 10 Process Evaluation (Pages VII-34-36)

A new sub-objective was added to compare the end-to-end processes of wholesale and retail repair. However, the process is a paper review combined with BellSouth only interviews⁷ It does not include review of historic metrics, sampling of CLEC trouble reports, and evaluation of trouble ticket fall-out as did this objective (M&R-5) in the New York test.

A new sub-objective was also added to evaluate BST's performance in making repairs. It is not clear how this will be measured as there is no indication that SQM measures will be used. (Also see M&R7—M&R Performance Results Comparison which does not reference this test objective)

VIII-Change Management Test Section

⁷ It is unclear how an interview with BellSouth personnel could be used to "ascertain parity in M&R process between retail and wholesale." See page VII-36 of test plan.

Change Management Practices Review (Page VIII-3)

Review should not be limited to use of EICCP and Carrier Notification, but should also include items such as day to day document changes and other more routine changes that affect CLECs. It should include usage and implementation and well as documents review.

Additionally, it is not clear that this objective will meet the change management test requirements of the FCC letter to US West regarding CLEC involvement in change management, release implementation, and dispute resolution.

Appendix A – Product Selection and Description

No substantive changes.

Appendix B (Scenarios)

CLECs were not consulted in scenario development as indicated by FCC letter to US West.

Appendix B-1 Pre-Ordering Scenarios

CSR inquiries for CLEC customers has been removed from scenarios. Timely updating of these types of CSRs continues to be a serious problem for AT&T and should be a part of this test.

There are no scenarios for service availability, such as loop qualification.

Appendix B-2 Resale Ordering Scenarios

Although the products and services listed on pages B2-2&3 lists a limited set of complex resale products to be tested for one activity type (migrate as specified), all but POTS resale has been deleted from the ordering scenarios.

There are no CLEC to CLEC migrations.

As stated earlier, the test only calls for volume testing of resale.

Appendix B-3 UNE Ordering Scenarios

Scenarios for UNEs have been reduced by more than 25% from earlier versions, including all inside and outside moves for UNE w/LNP and stand-alone port orders, and migrate as is for loop/port combinations.

Includes only 2 wire analog loops, 2 wire analog ports and loop/port combinations. Does not include other UNE types and combinations, including xDSL as required by the FCC letter to US West.

The plan does not comply with the guidance in Item 6 of the FCC letter to US West, which states “Third party testing can be conducted using orders from a combination of existing CLECs and a pseudo-CLEC.”

Appendix B-4 Billing Scenarios

No substantive changes. This section only contains four scenarios.

Appendix B-5 M&R Scenarios

Appendix C – Volume Testing

The plan has no details other than the year-end 01 for normal volume testing. Peak testing will include only flow-through orders, and will not include volume testing of provisioning or manual orders. No stress testing will occur. Also see earlier comments on page 1 regarding volume testing environment.

Appendix D-1 - Evaluation Criteria

The test techniques on page D1-3 do not include performance comparisons (between test manager collected results and BellSouth collected results) for rejections and FOCs. Billing also has no performance comparison. (See Page D1-5)

Additional detail was added to this section of the test plan. However, this section uses undefined terms such as “timely”, “that are relevant to a CLEC”, and “intervals that are reasonable” to describe evaluation measures.

Appendix D-2-Service Quality Measurements

The BellSouth SQM is not complete. It does not contain standards of performance for many measures. It is not disaggregated appropriately to correspond to the products being tested, e.g. switching and number portability. It is not in full compliance with the Georgia Order. And although the SQM references retail measures, no comparison is made between CLEC and retail performance in the test. Indeed, only one aspect of BellSouth’s retail performance is compared to wholesale (Sub-test 1 of M&R10), no other retail documentation is reviewed, no on-site observation is conducted of the performance it provides itself, and no comparison or review of its own performance measures data.

Flow-Through Evaluation Plan

This heading was changed from Audit to Evaluation. While the intent of this change is unclear, the section no longer complies with the language in the Commission's Order which requires a "full audit". Minimally, a full audit of the reports filed monthly would include an audit of BellSouth's retail flow-through as well as that of the CLEC, but the evaluation does not appear to cover retail orders. Therefore the accuracy of BellSouth's retail reporting or parity cannot be evaluated. An audit or evaluation of any performance measure should also evaluate whether this measure is being implemented in compliance with the Commission's Order in Docket 7892-U, but that also does not appear to be covered.

The test plan procedures on page 6 are extremely confusing. They are presented in two parts. The first is entitled transactional, and evaluates the flow-through of the MTP test transactions only. While this is in addition to the Commission's order, it appears similar to test objectives in New York and the Florida draft test plan.

The second procedure is entitled operational. The procedures state only that the operational analysis "is a multi-dimensional test method focused on the form, structure and content of the test target. The test addresses the organizational and process aspects of flow-through reporting. The Operational dimension of the test also specifically includes the calculation of the Flow-Through Measurement and the technology supporting it." These general descriptions are not procedures, and are impossible to specifically comment on. Due to the lack of information, it is unclear whether this evaluation will comply performance measures evaluation criteria outlined in the FCC letter to US West.

The last paragraph on page 6 describes how the accuracy of this performance measure will be assessed. It is unclear if the test plan combines two separate assessment activities into one sentence or is actually using transaction data in some combination with raw data for each of the three months of the evaluation period. (July, August and September). If the test plan is referring to the test transaction data in combination with the historical data, this seems to be a meaningless exercise. If the test plan intends two separate activities, the second, replicating the calculations using BellSouth data, is insufficient to determine the accuracy of BellSouth's flow-through as reported monthly to the Commission. Such a process would not appear to include a review of BellSouth's error analysis, as is required by the Commission's Order, and does not constitute a "full audit."

Other activities of a full audit to insure accuracy would include:

- An assessment of the accuracy and completeness of the raw data
- An assessment of the process by which the raw data is filtered and transformed into results
- An assessment of whether the data collection and metric calculation are consistent with regulatory orders (FCC NRPM and Georgia Performance Measures Order⁸)

⁸ For example, neither the FCC NPRM nor the Georgia Order call for the exclusion of orders that BellSouth has designed for fall out for manual handling, indeed such an exclusion defeats the purpose of

--An assessment of internal controls over the data collection processes and the software programs that process the data

Other issues with this section:

The chart on page 3 does not appear to indicate that errors can also generate from SOC's, or indicate LSRS which are routed through the LNP platform (which is illustrated on page 26 of the MTP.)

Information on page 4 appears to indicate that fatal rejections are subtracted from the LSRS, however, BellSouth has previously indicated that fatal rejections are outside the flow-through calculation process.

measuring flow-through. However, BellSouth has elected to exclude such orders. (See Part C of Flow Through Plan entitled Description of BellSouth's Flow-through Percent Calculation, pages 2 and 3)